

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

CASE NO.: 21-CV-642

FIREMAN'S FUND INSURANCE COMPANY,

Plaintiff,

v.

RACINE ZOOLOGICAL SOCIETY,

Defendant, Third Party Plaintiff

v.

CHINA LANTERN INTERNATIONAL, LLC
d/b/a ZIGONG LANTERN GROUP,

Third-Party Defendant.

AGREED MOTION FOR EXTENSION OF TIME

COMES NOW Third-Party Defendant, CHINA LANTERN INTERNATIONAL, LLC d/b/a ZIGONG LANTERN GROUP by and through the undersigned attorneys, hereby files this Motion for Extension of Time to Respond to Third-Party Plaintiff, RACINE ZOOLOGICAL SOCIETY'S THIRD-PARTY AMENDED COMPLAINT, and as grounds therefore state as follows:

1. Third-Party Plaintiff filed its Amended Complaint on October 29, 2021.
2. To facilitate narrowing the issues without unnecessary litigation, the Parties agree to additional time for Third-Party Defendant to file its Response until November 30, 2021.
3. This Motion for Extension of Time is not being filed for any improper purpose or delay and the Third-Party Plaintiff will suffer no prejudice by the enlargement of time.
4. Undersigned certifies that he conferred with Andrew Rider, counsel for Third-Party Plaintiff, and is authorized to represent that Third-Party Plaintiff does not object to this extension.

WHEREFORE, Third-Party Defendant respectfully requests that this Honorable Court grant the Third-Party Defendant's Motion for Extension of Time to Respond to the Third-Party Plaintiff's Amended Complaint, and any other relief deemed just and appropriate in light of the foregoing.

By: s/ Thomas Hunker
THOMAS HUNKER
Florida Bar No.: 38325

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of November 2021, a true and correct copy of the foregoing has been furnished by electronic filing with the Clerk of the court via CM/ECF, which will send notice of electronic filing to all counsel of record.

Thomas Hunker, Esq.
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China Lantern International, LLC
d/b/a Zigong Lantern Group,
a dissolved North Carolina, LLC.
Dated: November 29, 2021
s/ Thomas L. Hunker

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